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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

V.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DEFENDANTS' NOTICE OF HHS
DECLARATION DETAILING
COMPLIANCE WITH PARAGRAPH 4 OF
THE COURT'S PRELIMINARY
INJUNCTION**

1 Please take notice that Defendants are filing on behalf of the Department of Health and
 2 Human Services (“HHS”) a declaration detailing HHS’s compliance with Paragraph 4 of this
 3 Court’s April 18, 2025 preliminary injunction. On May 15, 2025, the Court ordered HHS to
 4 address compliance as to each of the terminated probationers that had written to the Court.¹ Those
 5 terminated probationers had written to the Court asserting that they had not yet received a notice
 6 from HHS, which would state to the terminated probationers that their termination was not
 7 “performance” or fitness based but was made as part of a government-wide mass termination. The
 8 declaration attached to this filing explains that notices have been sent to the terminated
 9 probationers and explains why the terminated probationers had not received the notices at the time
 10 that they wrote to the Court. A redacted version of that declaration is being filed on the public
 11 docket while a full version of the declaration—identifying personally identifiable information of
 12 the terminated probationers—is being filed under seal.

13 Dated: May 22, 2025

Respectfully submitted,

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25 s/ Yuri S. Fuchs
 YURI S. FUCHS

26
 27 ¹ The Court’s order and the attached letter made reference to “124 terminated
 28 probationers.” However, a review of the letter indicates that there are five (5) duplicate names in
 the letter. Thus, the list of terminated probationers who wrote to the Court consists of 119
 terminated probationers.

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